

1 **ERICKSON KRAMER OSBORNE LLP**

2 Julie C. Erickson (Bar ID 293111)
3 Elizabeth A. Kramer (Bar ID 293129)
4 Kevin M. Osborne (Bar ID 261367)
5 959 Natoma Street
6 San Francisco, CA 94103
7 Tel.: (415) 635-0631
8 julie@eko.law
9 elizabeth@eko.law
10 kevin@eko.law

11 *Attorneys for Plaintiffs*

12 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

13 AUSTIN WARD, DAVID KREVAT, and NABIL
14 MOHAMAD, individually and on behalf of all
15 others similarly situated

16 Plaintiffs,

17 vs.

18 JUMP TRADING, LLC; JUMP CRYPTO
19 HOLDINGS LLC; and DOES 1-10

20 Defendants.

21 Case No. 3:25-cv-03989-PHK

22 **JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
23 TIME TO RESPOND TO MOTION
24 FOR RULE 11 SANCTIONS**

25 Hon. Peter H. Kang

1 Pursuant to Local Rule 6-2, Plaintiffs Austin Ward, David Krevat, and Nabil Mohamad
2 (collectively, "Plaintiffs") and Defendants Jump Trading, LLC and Jump Crypto Holdings LLC
3 (collectively, "Jump Defendants") by and through their counsel, hereby stipulate:

4 WHEREAS, on September 25, 2025, the parties submitted, and the Court entered, a
5 proposed stipulated schedule for briefing related to Jump Defendants' Motion for Sanctions
6 Pursuant to Federal Rule of Civil Procedure 11 (the "Motion for Sanctions") (Dkt. 48);

7 WHEREAS, the schedule set the following deadlines: Jump Defendants' Motion for
8 Sanctions due by September 26, 2025; Plaintiffs' opposition due by October 24, 2025; Jump
9 Defendants' reply due by November 14, 2025;

10 WHEREAS, the Motion for Sanctions was filed on September 26, 2025;

11 WHEREAS, counsel for Plaintiffs requested a five-day extension to file their opposition
12 (moving the deadline from October 24 to October 29, 2025) because of multiple overlapping filing
13 deadlines in other matters and the departure of a key employee. Counsel for Jump Defendants
14 agreed to this request, and the parties further agreed that Jump Defendants' deadline to file the
15 reply brief would be similarly extended from November 14 to November 21, 2025;

16 WHEREAS, there have been three other time modifications in this case, whether by
17 stipulation or Court order;

18 WHEREAS, the requested time modification will not impact the case schedule or other
19 deadlines; and

20 WHEREAS, this stipulation will prejudice neither the interests of the parties nor those of
21 the Court.

22 NOW THEREFORE, counsel for Plaintiffs and Jump Defendants stipulate and agree,
23 subject to approval of the Court, to the following modifications to the briefing schedule:

24 1. Plaintiffs' opposition to the Motion for Sanctions shall be filed on or before October 29,
25 2025; and

26 2. Jump Defendants' reply brief in further support of their Motion for Sanctions shall be
27 filed on or before November 21, 2025.

1 IT IS SO STIPULATED.
2
3

Dated: October 23, 2025

4 Respectfully submitted,
5
6

ERICKSON KRAMER OSBORNE LLP

7 /s/ Julie C. Erickson

8 Julie C. Erickson

9 Julie C. Erickson (Bar ID 293111)
10 Elizabeth A. Kramer (Bar ID 293129)
11 Kevin M. Osborne (Bar ID 261367)
959 Natoma Street
12 San Francisco, CA 94103
Tel.: (415) 635-0631
13 julie@eko.law
elizabeth@eko.law
kevin@eko.law

14 *Attorneys for Plaintiffs*

15 *AUSTIN WARD, DAVID KREVAT,*
16 *and NABIL MOHAMAD*

KOBRE & KIM LLP

7 /s/ Jonathan D. Cogan

8 Jonathan D. Cogan

9 Jonathan D. Cogan (admitted *pro hac vice*)
10 Steven W. Perlstein (admitted *pro hac vice*)
11 Igor Margulyan (admitted *pro hac vice*)
Daisy Y. Joo (admitted *pro hac vice*)
12 Mathew T. Elder (admitted *pro hac vice*)
800 Third Avenue
13 New York, NY 10022
Tel.: (212) 488-1200
14 jonathan.cogan@kobrekim.com
steven.perlstein@kobrekim.com
igor.margulyan@kobrekim.com
daisy.joo@kobrekim.com
mathew.elder@kobrekim.com

15 *Attorneys for Plaintiffs*

16 *AUSTIN WARD, DAVID KREVAT,*
17 *and NABIL MOHAMAD*

18 Daniel A. Zaheer (Bar ID 237118)
19 150 California Street, 19th Floor
20 San Francisco, California 94111
Tel.: (415) 582-4751
daniel.zaheer@kobrekim.com

21 *Attorneys for Defendants Jump Trading, LLC*
22 *and Jump Crypto Holdings LLC*

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

2 Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this
3 document has been obtained from each of the above signatories.

4

5 By: /s/ Elizabeth A. Kramer
Elizabeth A. Kramer

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

[PROPOSED] ORDER

Pursuant to the Stipulation:

1. Plaintiffs' opposition to the Motion for Sanctions shall be filed on or before October 29,
2 2025; and
3. Jump Defendants' reply brief in further support of their Motion for Sanctions shall be
4 filed on or before November 21, 2025.

5
6 IT IS SO ORDERED.
7

8
9 Dated: _____, 2025

10
11 HON. PETER H. KANG
12 United States Magistrate Judge
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28